



08-CV-2188

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

FELICIA PICKETT JOHNSON  
Plaintiff

VS.

ST. BARNABAS NURSING HOME CORP.  
Defendant

docket # CV-2188/08  
DISCRIMINATION

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC#

DATE FILED: 6/26/08

**PERMISSION FOR MOTION TO AMEND CHARGES**

Comes now the plaintiff, Felicia Pickett Johnson, request the Honorable Judge Peck to amend charges in the above style case.

**MEMO ENDORSED**

If plaintiff wants to amend  
her complaint, she must  
file a motion - dated

as an exhibit a  
proposed amended

complaint, which attach  
your original complaint.

The law firm of Paul & Manafort  
can help plaintiff. This document is not  
submitted as denied without prejudice. Also, only can  
be sent to its court clerk of also be sent to define court

Respectfully,

Felicia Pickett Johnson  
Plaintiff

SO ORDERED:

Hon. Andrew J. Peck  
United States Magistrate Judge

cc: Paul Manafort/Karol (fa)  
Jef. Moreno

**BY FAX**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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FELICIA PICKETT JOHNSON  
Plaintiff

**CV 2188/08**

VS.

ST. BARNABAS NURSING HOME CORP.  
Defendant

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Plaintiff, Felicia Pickett Johnson, makes an exhibit to motion with amended charges.

Mrs. Johnson, plaintiff, states that St. Barnabas Nursing Home Corporation is responsible for the behavior of its employees, and that the Corporation left, said plaintiff to work in a hostile work environment without immediate remedial changes to prevent escalated and unwanted incidents of hostility, these actions or lack of action thereof, caused Mrs. Johnson to become a victim of 1. Discrimination pursuant to Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. section 2000e to 2000-17, (a) Race (b) color (c ) gender (d) religion (e) national origin and pursuant to Americans with Disabilities Act of 1990, as codified, 42 U.S.C. section 1211212117. 2. Retaliation to (a) adverse actions (b) covered individuals (c) Protected activity and 3. Harassment.

St. Barnabas Nursing Home Corporation's actions or lack of actions thereof in this matter caused the plaintiff, Mrs. Felicia Pickett Johnson, emotional stress, personal injury (Continuous Trauma), with pain and suffering, and a negative character image. Plaintiff removes co-defendant Ronald Granger from these Charges.

The plaintiff, Mrs. Felicia Pickett Johnson, seeks 3.5 million in punitive damages, and general compensatory damages.

Respectfully,

A handwritten signature in cursive script, appearing to read 'Felicia Pickett Johnson', with a long, sweeping horizontal line extending to the right.

Felicia Pickett Johnson

1466 Beach Avenue Apt. 1  
Bronx, New York 10460

# FAX TRANSMITTAL SHEET



**ANDREW J. PECK  
UNITED STATES MAGISTRATE JUDGE  
UNITED STATES DISTRICT COURT**

Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1370  
New York, N.Y. 10007-1312

Fax No.: (212) 805-7933  
Telephone No.: (212) 805-0036

**Dated:** June 26, 2008

**Total Number of Pages:** 3

TO	FAX NUMBER
David A. Allweiss, Esq. William Goldman Scher, Esq.	212-725-9630
Roosevelt Theodore Seymour, Esq.	718-624-7133

## **TRANSCRIPTION:**

### **MEMO ENDORSED 6/26/08**

If plaintiff wishes to amend her complaint, she must file a motion and attach as an exhibit a proposed Amended Complaint, which entirely replaces the original complaint. The Pro Se Office and Pro Se Manual can help plaintiff. This application is not sufficient and is denied without prejudice. Also, nothing can be sent to the Court unless it also is sent to defense counsel.

**Copies to: Felicia Pickett Johnson (Regular & Certified Mail)  
Judge Victor Marrero**